

signed more than 30 interconnection agreements with CLPs in its North Carolina service area.

In addition to negotiating and arbitrating private interconnection agreements with CLPs, the Act provides under Section 252(f)(1) that a Bell Operating Company (BOC) may prepare and file with a State Commission a statement of the terms and conditions that such company generally offers within that State to comply with the requirements of Section 251 and the regulations thereunder. Under Section 252(f)(2), a State Commission may not approve such statement unless it complies with Section 251 and the pricing standards for interconnection, unbundled network elements (UNEs), and resale contained in Section 252(d). BellSouth filed an SGAT with this Commission on August 5, 1997, as noted above.

The Statutory Framework of This Proceeding

The Act conditions BOC entry into in-region interLATA services on compliance with certain provisions of Section 271. BOCs must apply to the FCC for authorization to provide interLATA services originating in any in-region state. The FCC must issue a written determination on each application no later than 90 days after receiving such application. In acting on a BOC's application for authority to provide in-region interLATA services, the FCC must consult with the United States Attorney General and give substantial weight to the Attorney General's evaluation of the BOC's application. Finally, the FCC must consult with the applicable State Commissions to verify that the BOC has complied with the requirements of Section 271(c) of the Act. The Act places on BellSouth, as applicant, the burden of proving that all of the requirements for authorization to provide in-region interLATA services are met.

According to Section 271(c)(1), a BOC may enter the in-region long distance business in a state in one of two ways. These paths are known as "Track A" and "Track B" and are as follows:

Track A: Under Section 271(c)(1)(A) – Presence of a Facilities-Based Competitor – a Bell Operating Company must show that it has entered into one or more binding agreements that have been approved under Section 252 specifying the terms and conditions under which the Bell Operating Company is providing access and interconnection to its network facilities for the network facilities of one or more unaffiliated competing providers of telephone exchange service to residential and business subscribers. Such telephone exchange service may be offered by such competing providers either exclusively over their own telephone exchange service facilities or predominantly over their own telephone exchange service facilities in combination with the resale of the telecommunications services of another carrier.

Track B: Under Section 271(c)(1)(B) – Failure of CLP to Request Access – a Bell Operating Company can file a request for interLATA authority even if no

facilities-based competition exists that would allow the Bell Operating Company to meet the requirements of Section 271(c)(1)(A). In this case, the Bell Operating Company must have filed a general statement of terms and conditions that the company generally offers to provide such access and interconnection and this statement must have been approved or permitted to take effect by the State Commission under Section 252(f).

The access and interconnection provided or offered either pursuant to agreements or pursuant to the SGAT must meet the requirements of the 14-point competitive checklist contained in Section 271(c)(2)(B). The requirements of the 14-point competitive checklist are as follows:

Competitive Checklist. - Access or interconnection provided or generally offered by a Bell operating company to other telecommunication carriers meets the requirements of this subparagraph if such access and interconnection includes each of the following:

- (i) Interconnection in accordance with the requirements of Sections 251(c)(2) and 252(d)(1).
- (ii) Nondiscriminatory access to network elements in accordance with the requirements of Sections 251(c)(3) and 251(d)(1).
- (iii) Nondiscriminatory access to the poles, ducts, conduits, and rights-of-way owned or controlled by the Bell operating company at just and reasonable rates in accordance with the requirements of Section 224.
- (iv) Local loop transmission from the central office to the customer's premises, unbundled from local switching or other services.
- (v) Local transport from the trunk side of a wireline local exchange carrier switch unbundled from switching or other services.
- (vi) Local switching unbundled from transport, local loop transmission, or other services.
- (vii) Nondiscriminatory access to— (a) 911 and E911 services, (b) directory assistance services to allow the other carrier's customers to obtain telephone numbers, and (c) operator call completion services.
- (viii) White pages directory listings for customers of the other carrier's telephone exchange service.
- (ix) Until the date by which telecommunications numbering administration guidelines, plan, or rules are established, nondiscriminatory access to telephone numbers for

- assignment to the other carrier's telephone exchange service customers. After that date, compliance with such guidelines, plan, or rules.
- (x) Nondiscriminatory access to databases and associated signaling necessary for call routing and completion.
 - (xi) Until the date by which the Commission issues regulations pursuant to Section 251 to require number portability, interim telecommunications number portability through remote call forwarding, direct inward dialing trunks, or other comparable arrangements, with as little impairment of functioning, quality, reliability, and convenience as possible. After that date, full compliance with such regulations.
 - (xii) Nondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of Section 251(b)(3).
 - (xiii) Reciprocal compensation arrangements in accordance with the requirements of Section 252(d)(2).
 - (xiv) Telecommunications services are available for resale in accordance with the requirements of Sections 251(c)(4) and 252(d)(3).

In addition, Section 271(d)(3)(B) of the Act requires the FCC to determine that the requested authorization will be carried out in accordance with the structural safeguards contained in Section 272, and Section 271(d)(3)(C) requires the FCC to determine that the requested authorization is consistent with the public interest, convenience and necessity.

Although the FCC must consult with the State Commissions, it is clear that the FCC makes the decision on whether to grant in-region interLATA entry, subject to appellate review. The FCC has requested the states to conduct proceedings to develop a comprehensive factual record concerning BellSouth's compliance with the requirements of Section 271. This Commission takes its role seriously and has endeavored to fulfill its responsibilities under the Act. In this regard, we make no determination regarding BellSouth's Track A or Track B eligibility at this time, but will, at the appropriate time, provide the FCC with the results of the information gathering process undertaken in connection with this proceeding. Additionally, we make no determination or conclusion on whether BellSouth's requested authorization will be carried out in accordance with the requirements of Section 272 (Separate Affiliate Safeguards) of the Act. Accordingly, the questions addressed in this Order are limited to (1) whether the access or interconnection provided or generally offered by BellSouth complies with the requirements of the competitive checklist set out in Section 271(c)(2)(B); (2) whether BellSouth's SGAT should be approved, disapproved, or permitted to continue in effect; and (3) whether BellSouth's

entry into the interLATA market is consistent with the public interest, convenience and necessity in accordance with Section 271(d)(3)(C). A glossary of the acronyms referenced in this Order is attached hereto as Appendix A.

Based upon a careful consideration of the entire record in this proceeding, the Commission now makes the following

FINDINGS OF FACT

1. BellSouth is not currently providing or generally offering interconnection in accordance with the requirements of Sections 251(c)(2) and 252(d)(1). Therefore, BellSouth is not in compliance with checklist item (i).

2. BellSouth does not have performance measurements adequate to demonstrate that the electronic interfaces through which the CLPs will access the Operations Support Systems (OSS) are necessarily permitting the CLPs to access those systems in a nondiscriminatory manner. Therefore, the Commission is unable to determine from the record that BellSouth is in compliance with checklist item (ii). BellSouth is not required to recombine network elements that are purchased on an unbundled basis. BellSouth's proposed SGAT rates are cost-based and are in compliance with Section 252(d)(1).

3. BellSouth is providing or generally offering nondiscriminatory access to the poles, ducts, conduits, and rights-of-way owned or controlled by BellSouth at just and reasonable rates in accordance with the requirements of Section 224. Therefore, BellSouth is in compliance with checklist item (iii).

4. BellSouth is providing or generally offering the local loop transmission from the central office to the customer's premises unbundled from local switching or other services and is in compliance with checklist item (iv).

5. BellSouth is providing or generally offering local transport from the trunk side of the wireline local exchange carrier's switch unbundled from switching or other services and is in compliance with checklist item (v).

6. BellSouth is providing or generally offering local switching unbundled from transport, local loop transmission, or other services in compliance with checklist item (vi).

7(a). BellSouth is providing or generally offering nondiscriminatory access to 911 and E911 services and is in compliance with checklist item (vii)(I).

7(b). BellSouth is providing or generally offering nondiscriminatory access to directory assistance services and is in compliance with checklist item (vii)(II).

7(c). BellSouth is providing or generally offering nondiscriminatory access to operator call completion services and is in compliance with checklist item (vii)(III).

8. BellSouth is providing or generally offering white pages directory listings for customers of the other carrier's telephone exchange service and is in compliance with checklist item (viii).

9. BellSouth is providing or generally offering nondiscriminatory access to telephone numbers for assignment to the other carrier's telephone exchange service customers and is in compliance with checklist item (ix).

10. BellSouth is providing or generally offering nondiscriminatory access to databases and associated signaling necessary for call routing and completion and is in compliance with checklist item (x).

11. BellSouth is providing or generally offering interim telecommunications number portability through remote call forwarding (RCF), direct inward dialing (DID) trunks, or other comparable arrangements, with as little impairment of functioning, quality, reliability, and convenience as possible. Therefore, BellSouth is in compliance with checklist item (xi).

12. BellSouth is providing or generally offering nondiscriminatory access to such services or information as are necessary to allow the requesting carrier to implement local dialing parity in accordance with the requirements of Section 251(b)(3) and is in compliance with checklist item (xii).

12(a). BellSouth must provide intraLATA toll dialing service to CLPs at parity with BellSouth in North Carolina by the date on which BellSouth begins to provide interLATA service in North Carolina.

13. BellSouth is providing or generally offering reciprocal compensation arrangements in accordance with the requirements of Section 252(d)(2) and is in compliance with checklist item (xiii).

14. BellSouth is providing or generally offering telecommunications services such that they are available for resale in accordance with the requirements of Section 251(c)(4) and 252(d)(3) and is in compliance with checklist item (xiv).

15. BellSouth's Revised SGAT is allowed to continue in effect.

16. BellSouth's entry into the interLATA long distance market in North Carolina, through its affiliate BSLD, is consistent with the public interest, convenience and necessity

in accordance with Section 271(d)(3)(C) of TA96 and should be authorized by the FCC as soon as BellSouth meets all Section 271 requirements.

EVIDENCE AND CONCLUSIONS FOR FINDING OF FACT NO. 1

Issue: Is BellSouth providing or generally offering interconnection in accordance with the requirements of Sections 251(c)(2) and 252(d)(1)? Is BellSouth providing access and interconnection to its network facilities for the network facilities of such competing providers? [Checklist item (I)]

POSITIONS OF PARTIES

BELLSOUTH: Yes. BellSouth provides CLPs interconnection with BellSouth's network for the transmission and routing of telephone exchange service and exchange access and therefore satisfies this checklist item. Interconnection permits the exchange of local traffic between the networks of BellSouth and a CLP over trunks terminated at specified interconnection points. Section I of BellSouth's SGAT provides for complete and efficient interconnection of requesting telecommunications carriers' facilities and equipment with BellSouth's network. BellSouth's SGAT offers a reasonable means of interconnection for any company electing to operate under the terms, conditions, and prices of the SGAT. For interconnection arrangements that are not described in the SGAT, a CLP may take advantage of the bona fide request process to request such arrangements. BellSouth provided unrefuted testimony that, as of September 1, 1997, it had installed approximately 28,280 interconnection trunks from CLPs' switches to BellSouth's switches in BellSouth's nine-state region, including 5,762 in North Carolina. The intervenors presented no credible evidence to rebut BellSouth's proven ability to offer this checklist item.

BSLD: Supported the position taken by BellSouth and filed a joint Proposed Order with BellSouth.

PUBLIC STAFF: Yes. BellSouth satisfies the requirements of checklist item (I), as it offers through its SGAT and individual interconnection agreements with CLPs interconnection facilities to meet the same technical criteria and service standards that are used with its own network. Any startup problems referenced by intervenors are not problems with BellSouth's ordering or provisioning systems but are normal startup problems that occur when any new system is put in place. While BellSouth has the duty to provide interconnection at parity, the CLPs have the responsibility to learn how to use such interfaces. BellSouth's SGAT provides for the following: (1) trunk termination points generally at BellSouth tandems or end offices for the reciprocal exchange of local traffic; (2) trunk directionality allowing the routing of traffic over a single one-way trunk group or a two-way trunk group depending upon the type of traffic; (3) trunk termination through virtual collocation, physical collocation, and interconnection via purchase of facilities from

**STATEMENT OF GENERALLY AVAILABLE
TERMS AND CONDITIONS FOR
INTERCONNECTION, UNBUNDLING AND RESALE
PROVIDED BY BELL SOUTH TELECOMMUNICATIONS, INC. IN THE STATE OF
NORTH CAROLINA**

Pursuant to 47 U.S.C. § 252(f), BellSouth Telecommunications, Inc. ("BellSouth") makes the following terms and conditions generally available for the purposes of fulfilling its obligations under 47 U.S.C. §§ 251, 252(d) and 271. This Statement of Generally Available Terms and Conditions ("Statement") shall remain in effect for two (2) years from the date it takes effect under 47 U.S.C. § 252(f) following review by the North Carolina Utilities Commission. The filing of this Statement does not change or diminish BellSouth's willingness to negotiate individual agreements with competing local providers. This Statement is subject to revision to the extent necessary to comply with any legislative, regulatory or judicial order or rule that affects the rights and obligations created by this Statement. BellSouth has negotiated agreements with numerous competing local providers. These agreements are open to inspection, and provide examples of detailed contractual language that has been used by BellSouth and other carriers. These agreements may be utilized by other parties.

This Statement uses the following abbreviations throughout:

- A. CLP means a competing local provider certificated by the North Carolina Utilities Commission to offer and/or provide local telecommunications services in North Carolina.
 - B. Commission means the North Carolina Utilities Commission.
 - C. Telecommunications Act of 1996 ("Act") means Public Law 104-104 of the United States Congress effective February 8, 1996. The Act amended the Communications Act of 1934 (47 U.S.C. § 1, *et seq.*).
- I. **Interconnection** (47 U.S.C. 251(b)(5) § 251(c)(2), § 251(c)(6), § 252(d)(1),(2), § 271(c)(2)(B)(i))

BellSouth provides CLPs interconnection with BellSouth's network for the transmission and routing of telephone exchange service and exchange access on the following terms:

- A. Local Traffic. Local traffic means calls between two or more Telephone Exchange service users where both Telephone Exchange Services bear NPA-NXX designations associated with the same BellSouth local calling area or other authorized area (e.g., Extended Area Service Zones in adjacent local calling areas). Local traffic includes the traffic types that have been traditionally referred to as "local calling" and as "extended area service." All other traffic that originates and terminates between end

users within a LATA boundary is toll traffic. In no event shall the Local Traffic area for purposes of local call termination billing between the parties be decreased. No company shall represent Exchange Access traffic as Local Interconnection traffic.

1. Interconnection Points. Local interconnection is available at any technically feasible point within BellSouth's network. Interconnection is currently available at the following points:

- a. Line-side of local switch.
- b. Trunk-side of local switch.
- c. Trunk interconnection points for tandem switch.
- d. Central office cross-connect points.
- e. Out-of-band signal transfer points.

Interconnection at applicable unbundled network element points is also available. See Section II. below.

2. Additional Interconnection Points. BellSouth will provide local interconnection at any other technically feasible point, including meet point interconnection arrangements. Requests for interconnection at other points may be made through the bona fide request process set out in Attachment B.

3. Percent Local Use. When traffic other than local traffic is routed on the same facilities as local traffic, each company will report to the other a Percentage Local Usage ("PLU")¹. The application of the PLU will determine the amount of local minutes to be billed to the other company. For purposes of developing the PLU, each company shall consider every local call and every long distance call. Effective on the first of January, April, July and October of each year, BellSouth and the CLP shall update the PLU.

4. Unidentified local traffic. Whenever BellSouth delivers traffic to a CLP for termination on the CLP's network, if BellSouth cannot determine because of the manner in which the CLP has utilized its NXX codes whether the traffic is local or toll, BellSouth will charge the applicable rates for originating intrastate network access service as reflected in BellSouth's Intrastate Access Service Tariff. BellSouth will make appropriate billing adjustments if the CLP can

¹ Percent Local Usage (PLU) is defined as a factor to be applied to intrastate terminating minutes of use. The numerator shall include all "nonintermediary" local minutes of use adjusted for those minutes of use that only apply to local due to Service Provider Number Portability. The denominator is the total intrastate minutes of use including local, intrastate toll, and access, adjusted for Service Provider Number Portability less intrastate Terminating Company Pays minutes of use.

provide sufficient information for BellSouth to determine whether said traffic is local or toll. If BellSouth deploys an NXX code across its local calling areas in such a manner that a CLP cannot determine whether the traffic it delivers to BellSouth is local or toll, this subsection shall apply to BellSouth and the CLP.

5. Intermediary Tandem Switching. BellSouth will provide intermediary tandem switching and transport services for the CLP's connection of its end user to a local end user of another CLP where both CLPs are connected at the same tandem and termination of calls is authorized. Rates for intermediary tandem switching are set out in Attachment A.

6. Mutual Provision of Access Service. When BellSouth and a CLP provide an access service connection between an interexchange carrier ("IXC") and each other, each company will provide its own access services to the IXC on a multi-bill, multi-tariff meet-point basis. Each company will bill its own access services rates to the IXC with the exception of the interconnection charge. The interconnection charge will be billed by the company providing the end office function. BellSouth will use the Multiple Exchange Carrier Access Billing² system to establish meet point billing for all applicable traffic, including traffic terminating to ported numbers. 30-day billing periods will be employed for these arrangements. The recording company agrees to provide to the initial billing company, at no charge, the switched access detailed usage data within a reasonable time after the usage is recorded. The initial billing company will provide the switched access summary usage data to all subsequent billing companies within 10 days of rendering the initial bill to the IXC.

B. Exchange of intraLATA toll traffic. Exchange of intraLATA toll traffic between BellSouth and CLP networks shall occur as follows:

1. IntraLATA Toll Traffic. IntraLATA toll traffic is traffic that is not Local Traffic as defined in Section I.A. above.

2. Delivery of intraLATA toll traffic. For terminating its toll traffic on the other company's network, each company will pay BellSouth's current intrastate terminating switched access rate, inclusive of the Interconnection Charge and the Carrier Common Line rate elements of the switched access rate. See BellSouth's Intrastate Access Services Tariff.

² Multiple Exchange Carrier Access Billing means the document prepared by the Billing Committee of the Ordering and Billing Forum ("OBF"), which functions under the auspices of the Carrier Liaison Committee of the Alliance for Telecommunications Industry Solutions ("ATIS") and by Bellcore as Special Report SR-BDS-000983, containing the recommended guidelines for the billing of Exchange Service access provided by two or more LECs and/or CLPs or by one LEC in two or more states within a single LATA.

3. Rates. For originating and terminating toll traffic, each company shall pay the other BellSouth's intrastate or interstate whichever is appropriate, switched network access service rate elements on a per minute of use basis. Applicable rate elements are set out in BellSouth's Access Services Tariffs. The appropriate charges will be determined by the routing of the call. If a CLP is the BellSouth end user's presubscribed interexchange carrier or if the BellSouth end user uses a CLP as an interexchange carrier on a 10XXX basis, BellSouth will charge the CLP the appropriate tariff charges for originating network access services. If BellSouth is serving as the CLP end user's presubscribed interexchange carrier or if the CLP end user uses BellSouth as an interexchange carrier on a 10XXX basis, the CLP will charge BellSouth the appropriate BellSouth tariff charges for originating network access services.

4. Additional Interconnection. To the extent a CLP provides intraLATA toll service to its customers, it may be necessary for it to interconnect to additional BellSouth access tandems that serve end offices outside the local calling area.

5. Compensation for 800 Traffic. Each company shall compensate the other pursuant to the appropriate originating switched access charges, including the database query charge, for the origination of 800 traffic terminated to the other company.

6. Records for 800 Billing. Each company will provide to the other the appropriate records necessary for billing intraLATA 800 customers. The records provided will be in a standard EMR format for a fee of \$0.013 per record.

7. 800 Access Screening. Should a CLP require 800 Access Ten Digit Screening Service from BellSouth, it shall have signaling transfer points connecting directly to BellSouth's local or regional signaling transfer point for service control point database query information. The CLP shall utilize SS7 signaling links, ports and usage as set forth in Section X. below. The CLP will not utilize switched access FGD service. 800 Access Ten Digit Screening Service is an originating service that is provided via 800 Switched Access Service trunk groups from BellSouth's SS7 equipped end office or access tandem providing an IXC identification function and delivery of a call to the IXC based on the dialed ten digit number. The terms and conditions for this service are set out in BellSouth's Intrastate Access Services Tariff as amended

C. Methods of Interconnection. Interconnection is available through: (1) virtual collocation; (2) physical collocation; and (3) interconnection via purchase of facilities from either company by the other company. Rates for collocation are set out in Attachment A. Detailed guidelines for collocation are set out in BellSouth's Handbook for Collocation.

D. Trunk Groups. BellSouth and a CLP shall establish trunk groups between interconnecting facilities. Trunks may be one way or two way. Local and intraLATA

traffic may be routed over the same one-way trunk group. Two-way trunk groups are generally available for traffic utilizing intermediary tandem switching and, to the extent technically feasible, where a carrier does not carry sufficient traffic to justify separate one-way trunks. Requests for alternative trunking arrangements may be made through the bona fide request process set out in Attachment B.

E. Rates. Rates for interconnection for local traffic on the BellSouth network are set out in Attachment A. Compensation for interconnection is reciprocal, as set out in Section XIII. Late payment fees, not to exceed 1% per month after the due date, may be assessed if interconnection charges are not paid within thirty (30) days of the due date of the quarterly bill.

F. Billing. Billing for interconnection services will be through the Carrier Access Billing System ("CABS").

G. Network Design and Management for Interconnection. BellSouth will use its best efforts in conjunction with CLPs to create the most effective and reliable interconnected telecommunications networks. Detailed provisions governing network design and management for interconnection are contained in Section XVII. below.

H. Interconnection Technical Standards. Interconnecting facilities shall conform, at a minimum, to the telecommunications industry standard of DS-1 pursuant to Bellcore Standard No. TR-NWT-00499. Signal transfer point, Signaling System 7 ("SS7") connectivity is required at each interconnection point. BellSouth will provide out-of-band signaling using Common Channel Signaling Access Capability where technically and economically feasible, in accordance with the technical specifications set forth in the BellSouth Guidelines to Technical Publication, TR-TSV-000905. Facilities of each company shall provide the necessary on-hook, off-hook answer and disconnect supervision and shall hand off calling number ID when technically feasible.

I. Quality of Interconnection. The local interconnection for the transmission and routing of telephone exchange service and exchange access that BellSouth provides to CLPs will be at least equal in quality to what it provides to itself, where technically feasible, and any subsidiary or affiliate or to any other party to which BellSouth provides local interconnection. Attachment C contains detailed service descriptions, technical requirements and quality measures provided to CLPs. Section 14.4 of Attachment C is particularly applicable to interconnection. Performance measures are available as set out in Attachment I. See Section XVI. below.

J. Ordering and Provisioning Guidelines. BellSouth provides interconnection ordering and provisioning services to CLPs that are equal to the ordering and provisioning services BellSouth provides to itself, where technically feasible. Detailed procedures for ordering and provisioning BellSouth interconnection services are set forth in the Local Interconnection and Facility Based Ordering Guide. See Section XV. below.

II. Access To Unbundled Network Elements (47 U.S.C. § 251(c)(3), 252(d) and §§ 271(c)(2)(B)(ii). See also Statement Sections (iv),(v), (vi) and (x).

BellSouth provides CLPs access to unbundled elements of BellSouth's network on the following terms:

A. Bona Fide Request Process. BellSouth offers a Bona Fide Request Process jointly developed with AT&T, as set out in Attachment B. That process includes procedures and timelines for promptly addressing and resolving requests for new unbundled elements. CLPs that desire access to unbundled elements of BellSouth's network that are not described may below use the bona fide request process to assure prompt resolution of any requests. BellSouth will provide access to any network element on an unbundled basis where technically feasible.

B. Available Network Elements. The following BellSouth network elements are available on an unbundled basis:

1. Local Loop Transmission. BellSouth provides unbundled local loops. See Section IV. below.

2. Unbundled Local Transport. BellSouth provides unbundled local transport. See Section V. below.

3. Unbundled Local Switching. BellSouth provides unbundled local switching. See Section VI. below.

4. Signaling Network Elements/AIN Services. BellSouth provides unbundled signaling network elements and AIN services. See Section X. below.

5. Operations Support Systems. BellSouth provides CLPs unbundled access to several operations support systems. Access to these support systems is available through a variety of means, including electronic interfaces. The operations support systems available are:

a. Pre-Service Ordering. Pre-service ordering allows CLPs to determine the availability of features and services, assign a telephone number, advise the customer of a due date and validate a street address for service order purposes and to obtain customer service record information, as applicable to the service being ordered. CLPs may obtain access to customer service record information under a blanket letter of authorization.

b. Service Ordering. Service ordering provides the CLP order entry functions, including supplements, and the capability to establish directory listings.

- c. Provisioning. Provisioning information available to CLPs includes firm order confirmation and completions.
 - d. Service Trouble Reporting and Repair. Service trouble reporting and repair allows CLPs to report and monitor service troubles and obtain repair services. BellSouth provides CLPs service trouble reporting availability and monitoring in a non-discriminatory manner that provides CLPs the same ability to report and monitor service troubles that BellSouth provides to itself. BellSouth also provides CLPs an estimated time to repair, an appointment time or a commitment time, as appropriate, on all trouble reports.
 - e. Directory Listing and Line Information Databases. Access to the Directory Listing Database is discussed in Sections VII.B. and VIII.E below. Access to the Line Information Database is discussed in Section X.A.3.a. below.
 - f. Customer Daily Usage Data. Customer daily usage data provides detailed information for determining billable usage for services such as directory assistance or toll calls associated with a resold line or a ported telephone number. This usage option allows CLPs to bill their end-user customers at their discretion, rather than on BellSouth's billing cycles. It also allows a CLP to establish toll limits, detect fraudulent calling or analyze the usage patterns of its customers.
6. Interfaces for Operational Support Systems. BellSouth provides electronic interfaces for the following operational support systems functions: pre-service ordering, service ordering and provisioning, trouble reporting, and customer usage data. Customized interfaces are available through the bona fide request process. BellSouth also provides the option of placing orders manually (e.g., via facsimile) through the Local Carrier Service Center.
- a. Pre-Ordering. BellSouth provides electronic access to the following pre-ordering functions: service address validation, telephone number selection, product and service availability, due date information, and to customer service record information. Access is provided through the Local Exchange Navigation System (LENS), which provides a real-time, interactive interface to BellSouth databases.
 - b. Ordering and Provisioning. BellSouth provides CLPs electronic options for the exchange of ordering and provisioning information. The Exchange Access Control and Tracking System (EXACT) is for service requests involving interconnection trunking and many unbundled network elements. BellSouth provides an Electronic Data Interchange (EDI) arrangement for resale requests and some unbundled network elements.

As an alternative to the EDI arrangement, BellSouth also provides through LENS an ordering and provisioning capability that is integrated with the LENS pre-ordering capability.

c. Trouble Reporting. BellSouth provides two options for electronic trouble reporting. For exchange services, BellSouth offers CLPs access to the Trouble Analysis Facilitation Interface (TAFI). For individually designed services, BellSouth provides electronic trouble reporting through an electronic communications gateway.

d. Billable Usage Information. BellSouth provides CLPs electronic files containing billable usage associated with resold exchange lines, unbundled ports, and ported telephone numbers.

e. Rates. Rates for manual and electronic interfaces will be assessed prospectively upon Commission approval. Rates for electronic interfaces will defray a portion of the developmental costs for the interfaces. Nonrecurring service order charges may be differentiated for manually and electronically processed orders.

7. Collocation. Collocation allows CLPs to place equipment in BellSouth facilities. Physical and virtual collocation are available for interconnection and access to unbundled network element as described in Section II. below. BellSouth will provide physical collocation for CLP equipment unless BellSouth demonstrates to the Commission that physical collocation is not practical for technical reasons or space limitations. Detailed guidelines for collocation are contained in BellSouth's Handbook for Collocation. See Section XV. below.

C. Availability of Additional Network Elements. CLPs may use the bona fide request process described in Attachment B to ensure prompt processing and resolution of requests for additional network elements.

D. Rates. Rates for the unbundled network elements described above are set out in Attachment A. Special construction charges as set forth in BellSouth's Intrastate Special Access Tariff may apply.

E. Quality of Network Elements. BellSouth provides CLPs with all the unbundled network elements described in this section, and access to those unbundled network elements, as well as any other elements that are technically feasible, that is at least equal in quality to that which BellSouth provides itself, where technically feasible. Attachment C contains detailed service descriptions, technical requirements and quality measures applicable to CLP access to BellSouth unbundled network elements and the performance of those network elements. Performance measures are available as set out in Attachment I. See Section XVI. below.

F. Ordering and Provisioning. BellSouth provides unbundled network element ordering and provisioning services to CLPs that are equal to the ordering and provisioning services BellSouth provides to itself, where technically feasible. Detailed guidelines for ordering and provisioning unbundled BellSouth network elements are set out in the Local Interconnection and Facility Based Ordering Guide. See Section XV.

III. Access To Poles, Ducts, Conduits, and Rights of Way (47 U.S.C. § 251(b)(4) and § 271(c)(2)(B)(iii))

BellSouth provides non-discriminatory access to poles, ducts, conduits and rights-of-way under the following terms:

A. Standard License for Poles, Ducts, Conduits and Rights-of-Way. BellSouth will provide CLPs with nondiscriminatory access to poles, ducts, conduits and rights-of-way owned or controlled by BellSouth under the Standard Agreement set out in Attachment D.

B. Access to Engineering Records. BellSouth will provide access to relevant plats, maps, engineering records and other data to CLPs upon receiving a bona fide request for access and CLP agreement to reasonable terms to protect proprietary information.

C. Capacity Reservation. CLPs may reserve capacity for bona fide local telecommunications needs. BellSouth will reserve capacity for reasons of safety, reliability and generally applicable engineering purposes.

IV. Local Loop Transmission Unbundled From Local Switching (47 U.S.C. §§ 251(c)(3), 252(d) and 271(c) (2)(B)(iv))

BellSouth provides access to unbundled local loops and sub-loop elements on the following terms:

A. Unbundled Local Loops. Local loops provide transmission paths from the central office to the customer's premises. BellSouth provides a variety of local loop configurations. These loops include 2-wire and 4-wire voice grade analog, 2-wire Asymmetrical Digital Subscriber Line, 2-wire and 4-wire High-bit-rate Digital Subscriber Line, 2-wire ISDN, and 4-wire DS-1 digital grade.

B. Local Loop components. The following sub-loop elements are each separately available as unbundled network elements:

1. Loop Cross Connects. Loop cross connects allow the local loop to be transported from the main distribution frame in the central office to a CLP's collocated space.

2. Loop Concentration Systems. Central office loop concentration systems aggregate and disaggregate signals transmitted over local loops. Central office loop concentration systems are available to CLPs through the bona fide request process.

3. Network Interface Device. The Network Interface Device ("NID") is the physical point of connection between BellSouth's network, particularly loop facilities, and the end-user customer. It is essentially a cross-connect device used to connect loop facilities to inside wiring. Generally, the NID is a box on the side of the customer's premises. CLPs may establish NID-TO-NID connections utilizing BellSouth's NID. Any party connecting to BellSouth's NID shall assume full liability for its actions and for any adverse consequences that could result.

C. Rates. Rates for local loops and sub-loop elements are set out in Attachment A.

D. Quality of Network Elements. BellSouth provides CLPs with unbundled local loops and sub-loop elements, and access to those elements, that is at least equal in quality to that which BellSouth provides itself, where technically feasible. Attachment C contains detailed service descriptions, technical requirements and quality measures applicable to CLP access to BellSouth unbundled network elements including local loops and sub-loop elements. Performance measures are available as set out in Attachment I. See Section XVI. below.

E. Ordering and Provisioning. BellSouth provides local loop and sub-loop element ordering and provisioning services to CLPs that are equal to the ordering and provisioning services BellSouth provides itself, where technically feasible. Detailed guidelines for ordering and provisioning local loops and sub-loop elements are set out in the Local Interconnection and Facility Based Ordering Guide. See Section XV.

V. Local Transport From The Trunk Side Unbundled From Switching Or Other Services (47 U.S.C. §§ 251(c)(3), 252(d) and 271(c)(2)(B)(v))

BellSouth provides local transport from the trunk side of its switches unbundled from switching or other services under the following terms:

A. Local Transport Elements. Transport elements provide transmission paths that connect one location to another. BellSouth offers both dedicated and common local transport from the trunk side of its central office switches over a variety of transport options unbundled from switching or switch ports.

1. Dedicated Transport. Dedicated Transport is an interoffice transmission path used exclusively by a single carrier for the transmission of its traffic. Dedicated transport is available between BellSouth central offices and between

BellSouth central offices and CLP facilities. Transmission services and facilities available include DS-0, DS-1, DS-3 and optical cable.

2. Common Transport. Common transport is a shared transmission path used for the traffic of multiple carriers. Common transport is available between BellSouth end offices and between BellSouth end offices and BellSouth tandem switches. BellSouth provides common transport on a per minute of use basis. Transmission services and facilities available include DS-0, DS-1, DS-3 and optical cable.

3. Tandem Switching. Tandem switching establishes a communications path between two switching offices through a third switching office. BellSouth offers all the functionality of its tandem switches to CLPs unbundled from transport. Tandem switching includes the facilities connecting the trunk distribution frame to the switch, and all the functions of the switch itself, including those facilities that establish a temporary transmission path between two other switches as well as functions that are centralized in tandem switches such as call recording, routing of calls to operator services and signaling conversion functions.

4. Additional Options. Additional local transport options are available where technically feasible. CLPs may use the attached Bona Fide Request Process to obtain additional options.

B. Rates. Rates for local transport elements are set out in Attachment A.

C. Quality of Network Elements. BellSouth provides CLPs with unbundled local transport elements, and access to those elements, that is at least equal in quality to that which BellSouth provides itself, where technically feasible. Attachment C contains detailed service descriptions, technical requirements and quality measures applicable to CLP access to BellSouth unbundled network elements including transport elements. Performance measures are available as set out in Attachment I. See Section XVI. below.

D. Ordering and Provisioning. BellSouth provides local transport ordering and provisioning services to CLPs that are equal to the ordering and provisioning services BellSouth provides to itself, where technically feasible. Detailed guidelines for ordering and provisioning local transport elements are set out in the Local Interconnection and Facility Based Ordering Guide. See Section XV.

VI. Local Switching Unbundled from Transport, Local Loop Transmission or Other Services (47 U.S.C. §§ 251(c)(3), 252(d) and 271(c)(2)(B)(vi))

BellSouth provides local switching unbundled from transport, local loop transmission or other services under the following terms:

A. Local Switching. BellSouth offers all the functionality of its local switches to CLPs unbundled from transport, local loop transmission and other services. Local switching provides the functionality to connect the appropriate originating lines or trunks wired to the Main Distributing Frame or to the digital Cross Connect panel to a desired terminating line or trunk. Local switch functionality includes line termination and line side switching (dialtone) capability and other switch functionality, e.g., vertical features. It also provides access to all the features and functionality available to the switch and switch software including transport signaling, 911, operator directory and repair services as well as AIN and similar capabilities.

1. Local Switching Options. BellSouth offers the following local switch options:

- a. 2-Wire and 4-wire analog ports.
- b. 2-Wire and 4-wire ISDN ports.
- c. 2-Wire and 4-wire DID ports.
- d. 2-Wire analog hunting.
- e. Additional Options. Additional port types and other options are available where technically feasible. CLPs may use the Bona Fide Request Process set out in Attachment B to obtain additional switching options.

B. Rates. Rates for unbundled local switching services are set out in Attachment A. Specific vertical features associated with a port must be separately ordered. No charges will be assessed for the initial activation and use of vertical features.

C. Quality of Network Elements. BellSouth provides CLPs with unbundled local switching elements, and access to those elements, that is at least equal in quality to that which BellSouth provides itself, where technically feasible. Attachment C contains detailed service descriptions, technical requirements and quality measures applicable to CLP access to BellSouth unbundled network elements including local switching elements. Performance measures are available as set out in Attachment I. See Section XVI. below.

D. Ordering and Provisioning. BellSouth provides ordering and provisioning services for local switching to CLPs that are equal to the ordering and provisioning services BellSouth provides to itself, where technically feasible. Detailed guidelines for ordering and provisioning local switching elements are set out in the Local Interconnection and Facility Based Ordering Guide. See Section XV.

VII. Nondiscriminatory Access to (I) 911/E911 Emergency Network (47 U.S.C. § 251(c)(3) and § 271(c)(2)(B)(vii)(I); Regulations, §§ 901(J),(K)(2)); (II) Directory Assistance Services (§ 271(c)(2)(B)(vii)(II) and § 251(c)(3)); and (III) Operator Call Completion Services (§ 271(c)(2)(B)(vii)(III) and 251(c)(3))

BellSouth provides nondiscriminatory access to the 911/E911 network, directory assistance and operator call completion services and associated databases under the following terms:

A. Access to 911/E911. BellSouth provides CLPs equal access to 911/E911 service and the ability for CLPs to provide customer numbers and address information to 911/E911 providers on the following terms:

1. 911/E911 Service. Basic 911 and E911 provide callers access to the applicable emergency services bureau by dialing a three-digit universal telephone number.

2. Equal Access. A CLP's customers will be able to dial and reach emergency services bureaus providing 911/E911 service in the same manner as BellSouth customers.

3. Basic 911 Service Provisioning. For basic 911 service, BellSouth will provide to a CLP a list consisting of each municipality that subscribes to Basic 911 service. The list will also provide, if known, the E911 conversion date for each municipality and, for network routing purposes, a ten-digit directory number representing the appropriate emergency answering position for each municipality subscribing to 911. The CLP will be required to arrange to accept 911 calls from its end users in municipalities that subscribe to Basic 911 service and translate the 911 call to the appropriate 10-digit directory number as stated on the list provided by BellSouth. The CLP will be required to route that call to BellSouth at the appropriate tandem or end office. When a municipality converts to E911 service, the CLP will be required to discontinue the Basic 911 procedures and begin using E911 procedures.

4. E911 Service Provisioning. For E911 service, a CLP will be required to install a minimum of two dedicated trunks originating from the CLP's serving wire center and terminating to the appropriate E911 tandem. The dedicated trunks shall be, at a minimum, DS-0 level trunks configured either as a 2-wire analog interface or as part of a digital (1.544 Mb/s) interface. Either configuration shall use CAMA-type signaling with multifrequency ("MF") pulsing that will deliver automatic number identification ("ANI") with the voice portion of the call. If the user interface is digital, MF pulses, as well as other AC signals, shall be encoded per the u-255 Law convention. The CLP will be required to provide BellSouth daily updates to the E911 database. A CLP will be required to forward 911 calls to the appropriate E911 tandem, along with ANI, based upon the current E911 end office to tandem homing arrangement as provided by BellSouth. If the E911

tandem trunks are not available, the CLP will be required to route the call to a designated 7-digit local number residing in the appropriate Public Service Answering Point ("PSAP"). This call will be transported over BellSouth's interoffice network and will not carry the ANI of the calling party.

5. Rates. Charges for 911/E911 service are borne by the municipality purchasing the service. BellSouth will impose no charge on CLPs beyond applicable charges for BellSouth trunking arrangements.

6. 911/E911 Databases. BellSouth will load CLP end-user information into 911/E911 databases in the same manner it loads BellSouth end-user information so that CLP end-user information is available at the same time and in the same manner as BellSouth end-user information.

7. Detailed Practices and Procedures. The detailed practices and procedures contained in the E911 Local Exchange Carrier Guide For Facility-Based Providers determine the appropriate practices and procedures for BellSouth and CLPs to follow in providing 911/E911 services.

B. Directory Assistance Services. BellSouth provides CLPs nondiscriminatory access to directory assistance services and databases on the following terms:

1. Directory Assistance Database. BellSouth includes CLP subscriber listings in BellSouth's directory assistance database at no charge. CLPs must provide timely updates in the appropriate format. The same procedures and time intervals will apply to the entry of directory assistance information and updates for BellSouth, CLP and independent telephone company end-users.

2. BellSouth Directory Assistance Services. BellSouth provides CLPs and their subscribers access to its unbranded directory assistance service. CLP subscribers will be able to reach BellSouth's directory assistance by dialing the same numbers, and will receive the same treatment, as BellSouth subscribers. If the CLP provides ANI, then additional services such as directory assistance call completion will be available. BellSouth offers CLPs the following access options on the same terms as they are currently offered to other telecommunications providers:

a. Directory Assistance Access Service. This service is currently provided by BellSouth to interexchange carriers for directory assistance.

b. Direct Access Directory Assistance Service. This service provides direct on-line access to BellSouth's directory assistance database.

c. Directory Assistance Database Service. This service provides a copy of the BellSouth Directory Assistance database to requesting carriers.

3. Rates. Rates for Directory Assistance Services are set out in Attachment A.

C. Operator Call Completion Services. BellSouth provides operator services to CLPs in the same manner and extent, utilizing the same databases, that BellSouth provides operator services to its customers:

1. Busy Line Verification and Emergency Interrupt. Busy line verification and busy line verification and emergency interrupt allows BellSouth and CLP subscribers to request an operator to verify that a line is busy or to interrupt a conversation.

2. Intercept Service. This service provides for call interception in the event of a number change or disconnect. BellSouth provides intercept service to CLPs.

3. Operator Call Processing Access Service. This service provides operator and automated call handling for processing and verification of alternative billing information for collect, calling card and billing to a third number. This service can also be used to provide customized call branding, dialing instructions and other operator assistance.

4. Centralized Message Distribution System. Centralized Message Distribution System ("CMDS") is a Bellcore administered national system used to transfer specially formatted messages among companies. BellSouth will offer CLPs CMDS Hosting and access to various mechanized reports provided through the system as set out in detail in Attachment E.

5. Rates. Rates for Operator Call Completion Services are set out in Attachment A.

VIII. White Pages Directory Listings For CLP Customers (47 U.S.C. § 271(c)(2)(B)(viii))

BellSouth provides CLPs and their customers access to white pages directory listings under the following terms:

A. Listings. BellSouth or its agent will include CLP residential and business customer listings in the appropriate White Pages (residential and business) or alphabetical directories. Directory listings will make no distinction between CLP and BellSouth subscribers.

B. Rates. Subscriber primary listing information in the White Pages shall be provided at no charge to CLPs or their subscribers provided that the CLP provides subscriber listing information to BellSouth at no charge.

C. Procedures for Submitting CLP Subscriber Information. BellSouth will provide to CLPs a magnetic tape or computer disk containing the proper format for submitting subscriber listings. CLPs will be required to provide BellSouth with directory listings and daily updates to those listings, including new, changed, and deleted listings, in an industry-accepted format. These procedures are detailed in the Local Interconnection and Facility Based Ordering Guide. See Section XV.

D. Unlisted Subscribers. CLPs will be required to provide to BellSouth the names, addresses and telephone numbers of all CLP customers that wish to be omitted from directories.

E. Inclusion of CLP Customers in Directory Assistance Database. BellSouth will include and maintain CLP subscriber listings in BellSouth's directory assistance database at no charge. BellSouth and CLPs will formulate appropriate procedures regarding lead time, timeliness, format and content of listing information. CLP subscriber listings and information will be migrated as is upon a change of service provider.

F. Listing Information Confidentiality. BellSouth will accord a CLP's directory listing information the same level of confidentiality that BellSouth accords its own directory listing information, and BellSouth shall limit access to a CLP's customer proprietary confidential directory information to those BellSouth employees who are involved in the preparation of listings.

G. Optional Listings. Additional listings and optional listings will be offered by BellSouth at tariffed rates as set forth in the General Subscriber Services Tariff.

H. Delivery. BellSouth or its agent shall deliver White Pages directories to CLP subscribers at no charge.

IX. Nondiscriminatory Access to Telephone Numbers For CLP Customers (47 U.S.C. § 251(b)(3) and § 271((c)(2)(B)(ix))

A. Non-Discriminatory Access. BellSouth currently serves as a North American Numbering Plan administrator for its territory. During the term of this Statement, and while BellSouth continues to serve as the numbering plan administrator, BellSouth ensures that CLPs, whether facilities-based or reseller have nondiscriminatory access to telephone numbers for assignment to their customers under the same terms that BellSouth has access to telephone numbers. BellSouth provides numbering resources pursuant to the Bellcore Guidelines regarding number assignment. A CLP will be required to complete the NXX code application in accordance with Industry Carriers Compatibility Forum, Central Office Code Assignment Guidelines, ICCF 93-0729-010.

B. Future Numbering Plan. When BellSouth is no longer the North American Numbering Plan administrator, BellSouth will comply with the final and nonappealable guidelines, plan or rules adopted pursuant to 47 U.S.C. § 251(e).

X. Nondiscriminatory Access to Signaling and Signaling Databases (47 U.S.C. §§ 251(c)(3), 252(d)(2) and 271(c)(2)(B)(x))

BellSouth provides nondiscriminatory access to signaling and signaling databases under the following terms:

A. Signaling and Signaling Databases. Signaling elements offered by BellSouth include signaling systems and databases. Signaling elements facilitate call routing and completion. BellSouth provides CLPs mediated access to BellSouth's signaling network and signaling databases on an unbundled basis. Available signaling elements include Signaling Links, Signal Transfer Points and Service Control Points.

1. Signaling Links. Signaling links are dedicated transmission paths carrying signaling messages between carrier switches and signaling networks. Signal Link Transport is a dedicated set of two or four 56 kbps transmission paths, also known as A-links and D-links, between CLP designated Signaling Points of Interconnection that provide a diverse transmission path and cross connect to a BellSouth Signal Transfer Point. BellSouth will provide connections between a switch or Service Switching Point and a home Signal Transfer Point and connections between two Signal Transfer Point pairs in different company networks.

2. Signal Transfer Points. Signal Transfer Points ("STPs") are signaling message switches that interconnect Signaling Links to route signaling messages between switches and databases. STPs enable the exchange of Signaling System 7 ("SS7") messages between switching elements, database elements and STPs. STPs provide access to various BellSouth network elements such as local switching, databases and third-party provided services.

3. Service Control Points. Service Control Points ("SCPs") are databases that store and provide access and the ability to manipulate information required to offer particular services. BellSouth provides the following SCP databases on an unbundled basis:

a. Line Information Database. The line information database ("LIDB") is a SCP transaction-oriented database that contains records associated with subscriber line numbers and special billing numbers. CLPs may query BellSouth's LIDB to verify collect or third number billing calls. BellSouth will enter CLP line information into its LIDB under the terms of the Line Information Database Storage Agreement attached as Attachment F. Entry of line information into LIDB will allow

CLP end users to participate in alternate billing arrangements such as collect or third number billed calls.

b. Toll Free Number Database. The Toll Free Number Database is an SCP that provides functionality necessary for toll free number service.

c. Automatic Location Identification/Data Management System. The Automatic Location Identification/Data Management System contains subscriber information used to route calls to the appropriate Public Safety Answering Point.

d. Advanced Intelligent Network. BellSouth offers CLPs access to its SCP-based Advanced Intelligent Network ("AIN") through BellSouth's Service Creation Environment and Service Management System ("SCE/SMS"). SCE/SMS access allows CLPs to provide AIN services from either BellSouth switches or their own. It also allows CLPs to create service applications using BellSouth's AIN service creation tools and to deploy those services using BellSouth's service management tools. CLPs will have the same access to SCE/SMS as BellSouth.

B. Rates. Rates for BellSouth signaling services, including databases, are set out in Attachment A.

C. Ordering and Provisioning. BellSouth provides signaling and signaling database element ordering and provisioning services to CLPs that are equal to the ordering and provisioning services BellSouth provides itself, where technically feasible. Detailed guidelines for ordering and provisioning signaling and signaling database services are set out in the Local Interconnection and Facility Based Ordering Guide. See Section XV.

D. Quality of Network Elements. BellSouth provides CLPs with unbundled signaling and signaling database elements, and access to those elements, that is at least equal in quality to that which BellSouth provides itself, where technically feasible. Attachment C contains detailed service descriptions, technical requirements and quality measures applicable to CLP access to BellSouth unbundled network elements including signaling and signaling databases.

E. Local Exchange Routing Guide. BellSouth will input the NXXs assigned to a CLP into the Local Exchange Routing Guide ("LERG").

F. 800 Query Rates. Rates for a CLP to use BellSouth's 800 database for query purposes only, are set out in Attachment A.

XI. Interim Service Provider Number Portability (47 U.S.C. §§ 251(b)(2) and 271(c)(2)(B)(xi))

Until an industry-wide permanent solution can be achieved, BellSouth provides interim Service Provider Number Portability that allows customers switching from BellSouth to a CLP to retain the same telephone number(s) under the following terms:

A. Service Provider Number Portability. Service Provider Number Portability ("Number Portability") is a service arrangement which allows an end user customer who switches service providers to keep the same telephone number. Number portability is available only within the same serving wire center.

B. Quality of Service. BellSouth will provide number portability to CLPs and their customers with minimum impairment of functionality, quality, reliability and convenience.

C. Methods of Providing Number Portability. Number portability is available through either remote call forwarding or direct inward dialing trunks, at the election of the CLP. Remote call forwarding is an existing switch-based BellSouth service that redirects calls within the telephone network. Direct inward dialing trunks allow calls to be routed over a dedicated facility to the CLP switch that serves the subscriber. SS7 Signaling is required for the provision of either of these services. Detailed guidelines for the provision of number portability are set out in Attachment G. Other methods of providing number portability are available through the bona fide request process.

D. Rates. Rates for service provider number portability are set out in Attachment A.

E. Ordering and Provisioning. Detailed guidelines for ordering and provisioning are set out in the Local Interconnection and Facility Based Ordering Guide. See Section XV.

F. Permanent Solution. The FCC, the Commission and industry forums are working towards a permanent approach to providing service provider number portability. BellSouth will implement a permanent approach as developed and approved by the Commission, the FCC and industry forums.

XII. Local Dialing Parity (47 U.S.C. § 251(b)(3) and § 271(c)(2)(B)(xii))

BellSouth provides local dialing parity including the following:

A. Local Dialing Parity. Local dialing parity means that CLP customers will not have to dial any greater number of digits than BellSouth customers to complete the same call. In addition, CLP local service customers will experience at least the same quality as BellSouth local service customers regarding post-dial delay, call completion rate and transmission quality.